



May 8, 2009

Trevor Bowman, Public Works Director
City of Siloam Springs
P.O. Box 80
Siloam Springs, AR 72761

RE: City of Siloam Springs PCI

AFIN: 04-00106 NPDES Permit Tracking No.: AR0020273

Dear Mr. Bowman:

On April 23, 2009, I performed a routine pretreatment compliance inspection of the waste water treatment facility in accordance with the provisions of the Federal Clean Water Act, the Arkansas Water and Air Pollution Control Act, and the regulations promulgated there under. This inspection revealed the following violation:

Chain of custodies' were not properly filled out by the contract lab during the city's annual sampling in 2008 at Gates Rubber, Simmons Foods, and Cobb-Vantress. During the sampling events on February 19 and 20, 2008, preservatives were incorrectly marked for parameters analyzed at the above industries. For example, the contract lab indicates HNO₃ and H₂SO₄ were used to preserve total suspended solids, total phosphorous, ammonia nitrogen, nitrates, and copper at Simmons Foods on February 19, 2008. H₂SO₄ and NaOH were shown as preservatives for oil and grease, pH, and cyanide on February 19, 2008, at Simmons Foods.

The above item requires your immediate attention. Please submit a written response to these findings to the Water Division Enforcement Branch of this Department at the following address:

Cindy Garner, Technical Assistance Manager
Water Division Enforcement Branch
Arkansas Department of Environmental Quality
5301 Northshore Drive
North Little Rock, AR 72118-5317

This response should contain detailed documentation describing the course of action taken to correct the item noted. This corrective action should be completed as soon as possible, and the written response is due by May 22, 2009.

For additional information you may contact the enforcement branch by telephone at 501-682-0639 or by fax at 501-682-0910.

If I can be of any assistance, please contact me at 479-267-0811 ext. 12 (west@adeq.state.ar.us).

Sincerely,

A handwritten signature in black ink that reads "Alison West". The signature is written in a cursive, flowing style.

Alison West
District 1 Field Inspector
Water Division

cc: Water Division Enforcement Branch
Water Division Permits Branch



Form Approved
OMB No. 2040-0003

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Washington, D.C. 20460

NPDES Compliance Inspection Report

Section A: National Data System Coding

Transaction Code	NPDES	Yr/Mo/Day	Inspection Type	Inspector	Fac. Type
1 N 2 5 3 A R 0 0 2 0 2 7 3	11 12 0 9 0 4 2 3	17 18 P	19 S 20 1		
Remarks					
A F I N 0 4 - 0 0 1 0 6					
Inspection Work Days	Facility Evaluation Rating	BI	QA	Reserved	
67 69	70 N	71 N	72 N 73 74 75 	80	

Section B: Facility Data

Name and Location of Facility Inspected (For industrial users discharging to POTW, also include POTW name and NPDES permit number) Siloam Springs Pollution Control Plant 975 Anderson Avenue Siloam Springs, AR 72761	Entry Time/Date 8:55 a.m./4-23-09	Permit Effective Date October 1, 2007
	Exit Time/Date 4:00 p.m./4-23-09	Permit Expiration Date September 30, 2012
Name(s) of On-Site Representative(s)/Title(s)/Phone and Fax Number(s) Tom Myers/Wastewater Superintendent/479-524-5623/479-524-4653	Other Facility Data	
Name, Address of Responsible Official/Title/Phone and Fax Number Trevor Bowman/Public Works Director/479-524-5136/479-524-8513 City of Siloam Springs P.O. Box 80 Siloam Springs, AR 72761	Contacted Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	

Section C: Areas Evaluated During Inspection

(S = Satisfactory, M = Marginal, U = Unsatisfactory, N = Not Evaluated)

N Permit	N Flow Measurement	N Operations & Maintenance	N Sampling
N Records/Reports	N Self-Monitoring Program	N Sludge Handling/Disposal	N Pollution Prevention
N Facility Site Review	N Compliance Schedules	M Pretreatment	N Multimedia
N Effluent/Receiving Waters	N Laboratory	N Storm Water	N Other:

Section D: Summary of Findings/Comments (Attach additional sheets if necessary)

Chain of custodies' were not properly filled out by the contract lab during the city's annual sampling in 2008 at Gates Rubber, Simmons Foods, and Cobb-Vantress.

Name(s) and Signature(s) of Inspector(s) <i>Joy Alison West</i>	Agency/Office/Telephone/Fax AR Dept. of Environmental Quality-Fayetteville 479-267-0811 ext. 12/479-267-0819	Date May 1, 2009
Signature of Reviewer	Agency/Office/Phone and Fax Numbers	Date

ARKANSAS DEPARTMENT OF ENVIRONMENTAL QUALITY
PRETREATMENT COMPLIANCE INSPECTION (PCI) REPORT

Name of Municipality: City of Siloam Springs

AFIN Number: 04-00106

NPDES Permit Number(s): AR0020273

Program Tracked under NPDES Permit Number: AR0020273

Fact Sheet Preparation Date: N/A

Date of Last PCI/Audit: May 28-29, 2008/June 18-21, 2007

Date of Last Annual Report: August 28, 2008

Name of Inspector: Alison West

Date PCI Performed: April 23, 2009

Name, Title, and Telephone Number of Facility Representative:
Tom Myers, Waste Water Superintendent, 479-524-5623

Name and Title of Other Participants: NA

Number of IUs Visited: 2

Name(s) of IUs Visited: Gates Rubber Company and Simmons Foods

AN IU SITE VISIT FORM SHOULD BE COMPLETED FOR EACH IU VISITED

NOTE: ANY QUESTION PRINTED IN ALL CAPS AND BOLD PRINT INDICATED A REGULATORY REQUIREMENT AND MUST BE ANSWERED FOR THE PCI REPORT TO BE COMPLETE. A NO ANSWER TO ONE OF THESE QUESTIONS SHOULD RESULT IN AN UNSATISFACTORY RATING.

Form approved July 1989

A. INDUSTRIAL USER SURVEY

1. List any Significant Industrial Users (SIUs) which have been added or deleted from the program since the last audit or inspection. NA

2. Has ADEQ or EPA been notified of these changes? NA

3. HAS THE INDUSTRIAL USER SURVEY BEEN KEPT UPDATED? Yes

4. What procedures are being used to update the IU Survey?
Review of newspaper/phone book, review of plumbing/building permits, permit reapplication requirements, onsite inspections, questionnaire and permit information on internet.

5. Total number of Significant Industrial Users, according to the definition used by the POTW. (This number must be greater than or equal to the answer to question 6) 4

6. Number of Categorical Industrial Users: 2

7. How does the POTW determine the appropriate categorical standards to apply to an IU? Federal regulations are researched and appropriate standards are applied. EPA and ADEQ are consulted when assistance is needed.

8. List all categorical IUs discharging under the approved (such program. Include the name of the IU, the regulatory category as Metal Finishing), and the regulated process (phosphating, zinc plating, etc.) Additional listings can be made in the comments section if necessary.

Name of IU:	Category:	Regulated Process:
Franklin Electric	Metal Finishing	Aluminum Casting
Gates Rubber Company	Rubber Manufacturing	Vulcanizers

B. LOCAL LIMITS

1. IS THE POTW APPLYING LOCAL LIMITS WHICH HAVE BEEN APPROVED BY ADEQ OR EPA? Yes

2. Describe any apparent problems with the local limits.
There are no apparent problems with the local limits.

3. How often are pollutant scans of POTW influent, effluent, and sludge performed by the POTW? Does this fulfill the requirements of the approved program (as described in the fact sheet) and part III of the NPDES permit?

Pollutant:	Frequency:	Requirement in		Comments:
		Permit:	Program:	
Metals:				
Influent:	<u>Quarterly</u>	<u>Quarterly</u>	<u>Not req.</u>	<u>None</u>
Effluent:	<u>Quarterly</u>	<u>Quarterly</u>	<u>Not req.</u>	<u>None</u>
Sludge:	<u>2 times/yr</u>	<u>2 times/year</u>	<u>Not req.</u>	<u>None</u>
Organics:				
Influent:	<u>Once/yr</u>	<u>Once/yr</u>	<u>Not req.</u>	<u>None</u>
Effluent:	<u>Once/yr</u>	<u>Once/yr</u>	<u>Not req.</u>	<u>None</u>
Sludge:	<u>Twice/yr</u>	<u>Once/yr</u>	<u>Not req.</u>	<u>None</u>

4. Have there been any inhibitions or upsets at the POTW (since the last PCI of Audit) which were believed to be caused by industrial discharges? If so, describe the action taken by the City to ensure that the incident would not recur. Were these actions effective?

No

C. INDUSTRIAL USER CONTROL MECHANISM

1. Is the POTW using the type of control mechanism (permit, agreement, etc.) required by the approved program? Yes, permit

2. How many IU permits (or other control documents) have been issued? 4

3. DO ALL SIGNIFICANT IUS HAVE CURRENT (UNEXPIRED) CONTROL DOCUMENTS? IF NOT, LIST ALL UNPERMITTED SIUS, THE DATE OF EXPIRATION OF THEIR PREVIOUS PERMIT (IF APPLICABLE), AND THE REASON FOR DELAY IN ISSUING THE REQUIRED DOCUMENT.
Yes

4. Does the control document contain the following items?
An expiration date: Yes

Discharge limitations: Yes

If the program requires self-monitoring by the IUs, do the Permits contain:

IU self-monitoring requirements: Yes

IU reporting requirements: Yes

5. Indicate which of the following recommended standard conditions are contained in the control documents:

Sample location: Yes

Type of sample: Yes

Monitoring frequency: Yes

Bypass prohibition: Yes

Right of entry: Yes

Nontransferability: Yes

Revocation clause: Yes

Penalty Provisions: Yes

Slug load notification: Yes

Notification of process change: Yes

D. MONITORING OF IUS BY POTW

1. Indicate current inspection and sampling frequency and program requirement below:

	Current frequency:	Program Requirement:
Sampling:		
categorical IUs	<u>Once/year</u>	<u>Once/year</u>
other SIUs	<u>Once/year</u>	<u>Once/year</u>
Inspection:		
categorical IUs	<u>Once/year</u>	<u>Once/year</u>
other SIUs	<u>Once/year</u>	<u>Once/year</u>

2. HAS EACH SIU BEEN INSPECTED AND SAMPLED AT THE FREQUENCY REQUIRED BY THE APPROVED PROGRAM? Yes

3. Are inspections announced or unannounced? Both

4. Are records kept of each inspection? Yes

5. Does the inspection report contain an adequate description of the following:

Date and time of inspection: Yes

Officials present: Yes

Inspection of chemical storage areas: Yes

Description of regulated processes, categorical waste streams, and discharge location of these waste streams: Yes

Inspection of the pretreatment facilities: Yes

Review of self-monitoring records: Yes

Observation of IU self-monitoring procedures: NA

Verification that approved analytical techniques are used: Yes

Verification of IU flow measurement (where required): Yes

6. Overall adequacy of inspection documentation: Satisfactory.

7. DOES THE POTW SAMPLE IUS FOR ALL POLLUTANTS REGULATED IN THEIR PERMITS? (IT IS NOT NECESSARY TO SAMPLE FOR ALL POLLUTANTS EVERY TIME, BUT IT MUST BE DONE PERIODICALLY). **Yes**

8. Are analyses performed in accordance with EPA-approved methods (40 CFR 136)? **Yes**

9. Are sampling and flow monitoring equipment properly maintained? **NA, Contract lab samples industries.**

10. Is the POTW keeping proper field notes and chain of custody forms? **No. Chain of custodies' were not properly filled out by the contract lab during the city's annual sampling in 2008 at Gates Rubber, Simmons Foods, and Cobb-Vantress.**

11. Is the sampling location representative of the discharge to the collection system? **Yes**

12. Are sampling locations identified in POTW records? **Yes**

13. Are sampling services available in an emergency? **Yes**

14. What are the POTW's procedures for tracking receipt and review of IU reports, such as BMR's, semi-annual reports, progress reports, bypass reports, and self-monitoring reports? **Reports are reviewed by the pretreatment compliance officer.**

15. ARE SELF-MONITORING REPORTS REVIEWED TO VERIFY THAT ANALYSES WERE PERFORMED FOR ALL REGULATED PARAMETERS, AND TO EVALUATE COMPLIANCE WITH EFFLUENT LIMITS? **Yes**

16. IF VIOLATIONS ARE FOUND IN REPORTS, DOES THE POTW RESPOND TO ALL VIOLATIONS? **Yes**

17. What are the POTW's procedures for following up violations?
The city responds as specified in its Enforcement Response Plan.

18. **HAS THE POTW REVIEWED BMRS FOR COMPLIANCE WITH 40 CFR 403.12(b)?** N/A, There are no new categorical industries since the last inspection.

Review a Baseline Monitoring Report from the POTW's file, and indicate which of the following items can be identified in the BMR:

Name and address: N/A

Other environmental permits held: N/A

Description of operations: N/A

Process flow diagrams: N/A

Flow measurements: N/A

Measurements of regulated pollutants: N/A

Certification of compliance by the IU: N/A

Compliance schedule (if needed): N/A

19. Additional comments on the POTW's inspection and sampling procedures:

Chain of custodies' were not properly filled out by the contract lab during the city's annual sampling in 2008 at Gates Rubber, Simmons Foods, and Cobb-Vantress.

E. Enforcement

1. HAS THE POTW IMPLEMENTED ENFORCEMENT RESPONSE PROCEDURES TO ADEQUATELY ADDRESS EVERY IU VIOLATION OF PRETREATMENT STANDARDS AND REQUIREMENTS? Yes, the facility has an enforcement response plan.

2. How does the POTW respond to the following violations?

Effluent limitations: Follows written enforcement response procedures as outlined in the approved program.

Late reports: Follows written enforcement response procedures as outlined in the approved program.

Unpermitted discharges: Follows written enforcement response procedures as outlined in the approved program.

Slug loads or spills: Follows written enforcement response procedures as outlined in the approved program.

3. IS THE LIST OF SIGNIFICANT VIOLATORS PUBLISHED BY THE POTW DEVELOPED IN ACCORDANCE WITH EPA REGION VI CRITERIA FOR SIGNIFICANT VIOLATING INDUSTRIAL USER (DATED AUGUST 22, 1985)? No significant violators for the FY 2008.

4. List the SIUs which have met the criteria for Significant Violator within the last 12 months, and describe the enforcement action which has been taken by the POTW. If construction is required, please indicate whether the IU has been placed on an enforceable compliance schedule.

Name:	Type of Violation:	Enforcement Action:	Compliance Deadline:
N/A			

5. Comments on the POTW's enforcement procedures:
Enforcement response procedures appear to be adequate.

F. POTW'S PRETREATMENT ORGANIZATION STRUCTURE

1. Is the program structure essentially the same as that presented in the approved pretreatment program? **Yes**
2. Are staffing levels adequate? **Yes**
3. Are the responsible officials familiar with the approved program? **Yes**

G. MULTIJURISDICTIONAL ISSUES

1. List any IUs which are located outside of the jurisdictional area of the POTW:
None
2. Does the POTW have adequate procedures for controlling IUs located outside its jurisdictional area? **N/A**
3. Does the POTW have copies of permits for IUs in other cities? **N/A**
4. Have any of these IUs met the criteria for Significant Violator? If so, have they been published by the POTW in its annual list of Significant Violators? **N/A**
5. Comments on multijurisdictional issues: **None**

PRETREATMENT COMPLIANCE INSPECTION

IU SITE VISIT FORM

Name of Industry: Gates Rubber Company

POTW Name: City of Siloam Springs

Industry Contacts: Jesse VanPoole, Human Resources Manager
Justin Wilson, Health, Safety, Environmental
Specialist

Date and Time of Visit: 4-23-09 1:58-2:45 p.m.

Description of Manufacturing Process:
Manufactures rubber belts for automotive and industrial use.

Sources of Process Wastewater:
Contact and non-contact cooling water, steam condensate, and
wastewater from the vulcanization process.

Categorical Industry? Yes

Basis for Limits: Categorical standards and local ordinance

Point of Application: End of discharge pipe

Description of Pretreatment Equipment and Procedures:
Belt oil skimmer.

Spill Prevention and Solvent Management Procedures:
An integrated contingency plan and an SPCC plan.

Sampling Location and Equipment:
Manhole next to the flow monitoring building near the SE corner
of the Gates Rubber building. Environmental Services Lab
collects the sample by use of a portable sampler. Facility
has a 4210 Ultrasonic flow meter.

PRETREATMENT COMPLIANCE INSPECTION

IU SITE VISIT FORM

Name of Industry: Simmons Foods

POTW Name: City of Siloam Springs

Industry Contacts: Joe Earney, Director of Environmental Quality
Robert White, Environmental Engineer

Date and Time of Visit: 4-23-09/2:50-3:45 p.m.

Description of Manufacturing Process:
Poultry kill plant.

Sources of Process Wastewater:
Chicken processing with waste water from the kill plant, wash
water and chiller water, cooking and cooling water from the
pet food canning process at Plant #2.

Categorical Industry? No

Basis for Limits: Significant IU

Point of Application: End of discharge pipe

Description of Pretreatment Equipment and Procedures:
Primary and secondary screen, DAF, and solids management

Spill Prevention and Solvent Management Procedures:
Facility has a spill prevention plan.

Sampling Location and Equipment:
Sampling takes place at the south side of the waste water
treatment plant.

PPETS CODE SHEET

PRETREATMENT COMPLIANCE INSPECTION (PCI)

		CODE
INSPECTOR'S NAME:	<u>Alison West</u>	
NAME OF FACILITY:	<u>City of Siloam Springs</u>	
PERMIT NUMBER USED TO TRACK PROGRAM:	<u>AR0020273</u>	NPID
DATE OF PCI:	<u>April 23, 2009</u>	DTIA

PPETS WENDB DATA ELEMENTS

NUMBER OF SIGNIFICANT IUS (SIUS):	<u>4</u>	SIUS
NUMBER OF CATEGORICAL IUS:	<u>2</u>	CIUS
SIUS NOT SAMPLED OR INSPECTED BY POTW:	<u>0</u>	NOIN
SIUS WITHOUT CONTROL MECHANISM:	<u>0</u>	NOCM
SIUS IN SIGNIFICANT NONCOMPLIANCE WITH STANDARDS OR REPORTING:	<u>0</u>	PSNC
SIUS IN SIGNIFICANT NONCOMPLIANCE WITH SELF-MONITORING REQUIREMENTS:	<u>0</u>	MSNC
SIUS IN SIGNIFICANT NONCOMPLIANCE WITH SELF-MONITORING AND NOT INSPECTED OR SAMPLED BY POTW:	<u>0</u>	SNIN



Form Approved
OMB No. 2040-0003

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Washington, D.C. 20460

NPDES Compliance Inspection Report

Section A: National Data System Coding

Transaction Code	NPDES	Yr/Mo/Day	Inspec. Type	Inspector	Fac. Type
1 N 2 5 3 A R 0 0 2 0 2 7 3	11 12 0 9 0 4 2 3	17 18 I	19 S 20 2		

Remarks

0 0 2 C

Inspection Work Days	Facility Evaluation Rating	BI	QA	Reserved
67 69	70 N	71 N	72 N 73 74 75 	80

Section B: Facility Data

Name and Location of Facility Inspected (For industrial users discharging to POTW, also include POTW name and NPDES permit number) Gates Rubber Company 1801 N. Lincoln Siloam Springs, AR POTW: City of Siloam Springs, AR Permit Number: AR0020273	Entry Time/Date 1:58 p.m./4-23-09	Permit Effective Date NA
	Exit Time/Date 2:45 p.m./4-23-09	Permit Expiration Date NA

Name(s) of On-Site Representative(s)/Title(s)/Phone and Fax Number(s) Jesse VanPoole/Human Resource Manager/479-524-8164 Justin Wilson/Health, Safety, Environmental Specialist/479-524-8164	Other Facility Data
Name, Address of Responsible Official/Title/Phone and Fax Number Jesse VanPoole/Human Resource Manager/479-524-8164 Gates Rubber Company 1801 N. Lincoln Siloam Springs, AR 72761	

Contacted
Yes No

Section C: Areas Evaluated During Inspection

(S = Satisfactory, M = Marginal, U = Unsatisfactory, N = Not Evaluated)

N Permit	N Flow Measurement	N Operations & Maintenance	N Sampling
N Records/Reports	N Self-Monitoring Program	N Sludge Handling/Disposal	N Pollution Prevention
N Facility Site Review	N Compliance Schedules	Y Pretreatment	N Multimedia
N Effluent/Receiving Waters	N Laboratory	N Storm Water	N Other:

Section D: Summary of Findings/Comments (Attach additional sheets if necessary)

The inspection of this facility was part of a pretreatment compliance inspection of the city of Siloam Springs.

The contract lab, ESC, does all of the sampling and analysis for the industry.

Name(s) and Signature(s) of Inspector(s) Alison West	Agency/Office/Telephone/Fax AR Dept. of Environmental Quality-Fayetteville 479-267-0811 ext. 12/479-267-0819	Date 5-1-09
Signature of Reviewer	Agency/Office/Phone and Fax Numbers	Date

POTW Pretreatment Program

Industrial Site Visit

Name of Industry: Gates Rubber Company

Industry Contacts: Dennis Greeson, Safety Manager

Type of Industry: Rubber Belts

Date of Visit: 4-23-09

- | | | | |
|--|---|--|---|
| 1. Significant industrial user: | <input checked="" type="checkbox"/> Yes | <input type="checkbox"/> No | <input type="checkbox"/> Not Determined |
| 2. Pretreatment equipment or procedures? | <input checked="" type="checkbox"/> Yes | <input type="checkbox"/> No | <input type="checkbox"/> N/A |
| 3. Pretreatment equipment maintained and operational? | <input checked="" type="checkbox"/> Yes | <input type="checkbox"/> No | <input type="checkbox"/> N/A |
| 4. Hazardous waste generated or stored? | <input type="checkbox"/> Yes | <input checked="" type="checkbox"/> No | <input type="checkbox"/> N/A |
| 5. Proper solid waste disposal? | <input checked="" type="checkbox"/> Yes | <input type="checkbox"/> No | <input type="checkbox"/> N/A |
| 6. Solvent management/TTO control? | <input type="checkbox"/> Yes | <input type="checkbox"/> No | <input checked="" type="checkbox"/> N/A |
| 7. Suitable sampling location? | <input checked="" type="checkbox"/> Yes | <input type="checkbox"/> No | <input type="checkbox"/> N/A |
| 8. Appropriate self-monitoring procedures / equipment? | <input checked="" type="checkbox"/> Yes | <input type="checkbox"/> No | <input type="checkbox"/> N/A |
| 9. Adequate spill prevention? | <input type="checkbox"/> Yes | <input type="checkbox"/> No | <input checked="" type="checkbox"/> N/A |
| 10. Industry familiar with limits and requirements? | <input checked="" type="checkbox"/> Yes | <input type="checkbox"/> No | <input type="checkbox"/> N/A |

Additional Comments: Environmental Services Company is used for industry's sampling. Rineco collects waste. Flow meter was calibrated on June 11, 2008.

Visit Conducted By: Alison West Date: 4-23-09

 <p style="text-align: center;">UNITED STATES ENVIRONMENTAL PROTECTION AGENCY Washington, D.C. 20460</p> <h2 style="text-align: center;">NPDES Compliance Inspection Report</h2>	Form Approved OMB No. 2040-0003
--	------------------------------------

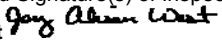
Section A: National Data System Coding																													
Transaction Code			NPDES								Yr/Mo/Day					Inspec. Type		Inspector		Fac. Type									
1	N	2	5	3	A	R	0	0	2	0	2	7	3	11	12	0	9	0	4	2	3	17	18	I	19	S	20	2	
Remarks																													
0	0	2	C																										
Inspection Work Days				Facility Evaluation Rating				BI		QA		Reserved																	
67				69	70	N	71	N	72	N	73		74	75															80

Section B: Facility Data	
Name and Location of Facility Inspected (For industrial users discharging to POTW, also include POTW name and NPDES permit number) Simmons Foods 316 N. Hico, Plant 1 Siloam Springs, AR 72761 POTW: City of Siloam Springs Permit #: AR0020273	Entry Time/Date 2:50 p.m./4-23-09 Exit Time/Date 3:45 p.m./4-23-09 Permit Effective Date NA Permit Expiration Date NA

Name(s) of On-Site Representative(s)/Title(s)/Phone and Fax Number(s) Joe Earney/Director of Environmental Quality/479-524-8151 Robert White/Operations Manager/479-524-8151	Other Facility Data
Name, Address of Responsible Official/Title/Phone and Fax Number Joe Earney/Director of Environmental Quality/479-524-8151/NA Simmons Foods P.O. Box 430 Siloam Springs, AR 72761	Contacted Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>

Section C: Areas Evaluated During Inspection							
(S = Satisfactory, M = Marginal, U = Unsatisfactory, N = Not Evaluated)							
N	Permit	N	Flow Measurement	N	Operations & Maintenance	N	Sampling
N	Records/Reports	N	Self-Monitoring Program	N	Sludge Handling/Disposal	N	Pollution Prevention
N	Facility Site Review	N	Compliance Schedules	Y	Pretreatment	N	Multimedia
N	Effluent/Receiving Waters	N	Laboratory	N	Storm Water	N	Other:

Section D: Summary of Findings/Comments (Attach additional sheets if necessary)
<p>The inspection of this facility was part of a pretreatment compliance inspection of the city of Siloam Springs.</p> <p>The contract lab, ESC, does all of the sampling and analysis for the industry.</p>

Name(s) and Signature(s) of Inspector(s) Alison West 	Agency/Office/Telephone/Fax AR Dept. of Environmental Quality-Fayetteville 479-267-0811 ext 12/479-267-0819	Date 5-1-09
Signature of Reviewer	Agency/Office/Phone and Fax Numbers	Date

Industrial Site Visit

Name of Industry: Simmons Foods

Industry Contacts: Joe Earney, Director of Environmental Quality and Robert White, Operations Manager

Type of Industry: Poultry

Date of Visit: 4-23-09

- 1. Significant industrial user: Yes No Not Determined
- 2. Pretreatment equipment or procedures? Yes No N/A
- 3. Pretreatment equipment maintained and operational? Yes No N/A
- 4. Hazardous waste generated or stored? Yes No N/A
- 5. Proper solid waste disposal? Yes No N/A
- 6. Solvent management/TTO control? Yes No N/A
- 7. Suitable sampling location? Yes No N/A
- 8. Appropriate self-monitoring procedures / equipment? Yes No N/A
- 9. Adequate spill prevention? Yes No N/A
- 10. Industry familiar with limits and requirements? Yes No N/A

Additional Comments: Environmental Services Company is used for industry's sampling. ISCO4230 Bubbler flow meter was calibrated on June 11, 2008.

Visit Conducted By: Alison West Date: 4-23-09

-----Original Message-----

From: David Cameron [mailto:dcaeron@siloomsprings.com]

Sent: Tuesday, June 02, 2009 9:26 AM

To: Garner, Cindy

Cc: Judy Toler; Tom Myers

Subject: Inspection Response

Cindy:

I apologize for our tardy reply. We have made a personnel change in the water and wastewater department and we missed the Friday deadline. Your patience is appreciated.

Regards,

David Cameron, City Administrator



June 2, 2009

Ms. Cindy Garner, Technical Assistance Manager
Water Division Enforcement Branch
Arkansas Department of Environmental Quality
5301 North Shore Drive
North Little Rock, AR 72118-5317

RE: Siloam Springs NPDES
AFIN: 04-00106 NPDES Permit No. AR0020273

Dear Ms. Garner:

Please allow this letter to serve as response to the Routine Compliance Evaluation, Pretreatment Compliance and Sanitary Overflow Inspection Letters dated May 8, 2009, and received May 15, 2009. The letter resulted from an ADEQ inspection conducted on April 22nd and 23rd by Ms. Alison West.

COMPLIANCE EVALUATION INSPECTION

A violation was cited which stated that the method which the City of Siloam Springs had been using for the determination of dissolved oxygen and total residual chlorine is no longer acceptable. The City of Siloam Springs is now utilizing Standard methods number 4500-O G, Oxygen dissolved Electrode and 4500-Cl G for Chlorine-Total residual Spectrophotometric, DPD methods.

PRETREATMENT COMPLIANCE INSPECTION

Inspection of the pretreatment program found that chain of custody forms were not properly filled out by the lab contracted to run tests last year. City staff had already discovered that these forms were not submitted properly, and had requested Environmental Testing Group, Inc. to make all necessary corrections. This information was shown to Ms. West at the time of the inspection. Attached please find Exhibit "A", which illustrates the incorrect way to complete the form, and Exhibit "B", which shows the correct way.

SANITARY OVERFLOW INSPECTION

Emergency contact information should be posted at the lift stations. The City has ordered signs made which will contain emergency contact information, and will be placed at each lift station.

The City of Siloam Springs takes our compliance with ADEQ seriously. We have taken necessary steps to comply with Ms. West's report.

If you have questions regarding these matters, please feel free to contact me.

Sincerely,

A handwritten signature in blue ink, appearing to read "DC", is written over the word "Sincerely,".

David Cameron
City Administrator

cc: Peggy Woody, City Clerk (w/attachments)
Tom Myers, Wastewater Superintendent (w/attachments)
Alison West, District Field Inspector (w/attachments)

Exhibit "A"

Environmental Testing Group, Inc
 1702 East Central Avenue
 Bentonville, AR 72712
 Ph. (479) 271-7996 FX. (479) 271-8394

CHAIN OF CUSTODY RECORD AND ANALYSIS REQUEST

Project Manager: Dan Cole
 Address: PO Box 1030
 Project Location: 1915
 Project Number: 1915
 Phone #: 479-549-6053
 FAX #: 479-549-6053
 Project Name: Effluent
 Sampler: X

Sample ID	Lab # (Lab use only)	Grab	Composite	Matrix				Method Preserved				Date Sampled	Time Sampled	Analysis Request	Other
				Water	Soil	Sludge	Other (Specify)	H ₂ SO ₄	HNO ₃	Ice	Non preserved				
AB82007-01			X	X				X	X	X		2/19-20/08	1140-1140	X	
Effluent Grab	AB82007-02	X	X					X	X	X		2/20/08	1205	X	

AB82007-01 D
 Effluent
 Sampled: 02/20/08 11:40
 Water- Work Order Label

Retrieved By: _____ Date: _____ Time: _____ Received By: _____
 Retrieved By: _____ Date: _____ Time: _____ Received By: _____

Retrieved By: Joshua Hlavstad Date: 2/20/08 Time: 1250 Received By: Deanne Blavansky

Remarks: PH-6.98 @ 1207
 Dup-6.98 @ 1205
 taken @ 1205

LABORATORY COMMENTS:
 In Lab Temp: 22
 Outbody Seals: Y
 Bottles Supplied by ETG: N

Receipt of sample is by Environmental Testing Group, Inc. acknowledges acceptance of standard Terms and Conditions on the reverse side.

Exhibit 'B'

nelap
 1702 East Central Avenue
 Bentonville, AR 72712
 Ph: (479) 271-7996
 Fax: (479) 271-8394

Cobb-Vantress Effluent
CHAIN OF CUSTODY RECORD

CLIENT INFORMATION		Reporting Information		Bottle Type:		Preservation Codes:											
Cobb - Vantress PO Box 1030 Silcaam Springs, AR 72761		Project Name		A) 1 Liter Poly		1. Cool & Degrees Centigrade Non-preserved											
Customer Number 1915		E-Mail:		B) 500 mL Poly		2. Sulfuric Acid (H ₂ SO ₄), pH < 2											
Project Manager: Dan Cole		Telephone: (479) 549-6053		C) 250 mL Poly		3. Nitric Acid (HNO ₃), pH < 2											
		Fax:		D) 1 L Amber Glass		4. Thiosulfate for Dechlorination											
		Bill for P.O.#:		E) 330 mL Amber Glass		5. Hydrochloric Acid (HCl)											
				F) 100 mL Snap Cap		6. Sodium Hydroxide (NaOH), pH > 12											
				G) 43 mL VOA		7. H ₃ PO ₄ , Phosphoric Acid											
				H) 1 L Wide Mouth		TEST PARAMETERS											
				Preservative Code:		1	2	3	2	6							
				Bottle Type:		A	B	B	D	A							
Sampler(s) Signature: <i>[Signature]</i>		Sampler(s) Printed: <i>Toshua Marshall</i>		SAMPLE IDENTIFICATION, DESCRIPTION		TSS, BOD, pH		NH ₃ -N, Total P		Oil & Grease		Cyanide					
LAB ID #	SAMPLE COLLECTION Dates	Time/s	Grab Comp	Number of Bottles	Sample Matrix S-Solid W-Water												
BC90351-01	3/16-17/09	1035-105	X	1	W	Effluent	X										
			X	1	W	Effluent		X									
			X	1	W	Effluent			X								
BC90351-02	3/17/09	1120	X	1	W	Effluent				X							
	3/17/09	1120	X	1	W	Effluent					X						

BC90351-01 D
 Effluent
 Sampled: 03/17/09 10:25
 Water, Work Order Label
 Cobb - Vantress

SAMPLE CONDITION UPON RECEIPT IN LAB

REMARKS / COMMENTS

- 1. CUSTODY SEALS: Yes No
- 2. CONTAINERS CORRECT: Yes No
- 3. COC/LABELS AGREE: Yes No
- 4. PRESERVATION CONFIRMED: Yes No
- 5. RECEIVED ON ICE: Yes No
- 6. TEMPERATURE UPON RECEIPT: 3 °C

FOR COMPLETION BY LAB ONLY

FEDEX UPS

ADEQ

A R K A N S A S
Department of Environmental Quality

June 26, 2009

Thomas A. Myers, Water Pollution Control Plant Superintendent
City of Siloam Springs
P.O. Box 80
Siloam Springs, AR 72761

RE: NPDES Permit AR0020273, AFIN 04-00106
Response to Inspection

Dear Mr. Myers:

ADEQ has received your response to the April 22, 2009 routine compliance evaluation inspection and pretreatment compliance evaluation inspection of your facility by our District Field Inspector, Alison West. Your letter appears to adequately address the discrepancies identified during the visit.

The Department will keep the inspection and response on file and will consider them as required by the Pollution Control and Ecology Commission Regulation No. 7, Civil Penalties. This regulation requires ADEQ to consider the past history of your company and how expeditiously the violations were addressed in determining any civil penalty that may be necessary for any violations.

Thank you for your attention to this matter. If we need further information, we will contact you. Should you have any questions, feel free to contact me by phone at 501-682-0632 or e-mail at robertsa@adeq.state.ar.us. In any written correspondence to this Department, please refer to NPDES Permit AR0020273 and AFIN 04-00106.

Sincerely,



Anne Roberts
Enforcement Analyst
Enforcement Branch
Water Division